

Classification: Public

# MUFG Pension & Market Services Supplier Code of Conduct

**DECEMBER 2024**

## Our Supplier Code of Conduct

MUFG Pension & Market Services is a responsible business committed to building a sustainable future for our people, clients, and the communities in which we operate. To do this, we recognise we have a responsibility to work with our suppliers to manage environmental and social risks, and to maintain the highest standards of corporate governance.

We expect that suppliers, contractors and consultants (“suppliers”) who sell goods or services to MUFG Pension & Market Services Holdings Proprietary Limited and its subsidiaries (“MUFG Pension & Market Services”), will act responsibly and ethically. This means their business dealings will be conducted with integrity and comply with local and applicable international laws, while demonstrating a willingness to uphold the values of MUFG Pension & Market Services.

This Supplier Code of Conduct (“Code”) sets out the minimum requirements for suppliers in seeking to do business with MUFG Pension & Market Services.

We expect that suppliers, in their provision of goods and services to MUFG Pension & Market Services:

- will agree to the Code;
- will be responsible for ensuring that their employees, representatives and sub-contractors understand the Code;
- will ensure that their employees, representatives and sub-contractors adhere to the obligations set out in the Code.

We also encourage our suppliers to go beyond compliance and adopt best practices that align with our sustainability goals. We may also require suppliers to complete a questionnaire which forms part of our supplier due diligence process.

We reserve the right to monitor and verify our suppliers' compliance with the Code, and to terminate our relationship with any supplier who fails to meet our expectations or remediate any issues.

## Human Rights

We recognise that we have a responsibility to respect human rights, and the opportunity to positively impact human rights through our value chain.

Our suppliers must:

- Uphold the principles of the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights.
- Respect the rights and interests of the communities and stakeholders affected by their operations, and engage with them in a transparent and constructive manner.
- Prevent and address any adverse human rights impacts that may arise from their activities, and provide effective remedies for any harm caused.
- Not be complicit in any human rights abuses, either directly or indirectly, and report any incidents or allegations to us promptly.

## Labour

We are committed to providing an inclusive environment that supports the health, safety and wellbeing of our people, and we expect our suppliers to do the same.

Our suppliers must:

- Comply with all applicable labour laws and regulations, including those related to wages, benefits, working hours, overtime, breaks, rest days, and leave.
- Ensure that all workers are employed freely and voluntarily, and that there is no use of forced, bonded, indentured, or child labour in their operations. Our suppliers must comply with the Modern Slavery Act 2018 (Cth) in Australia and the Modern Slavery Act 2015 in the UK, and any other relevant legislation or regulation that aims to prevent and combat modern slavery and human trafficking.
- Respect the rights of workers to join or form trade unions and to bargain collectively, in accordance with local laws and regulations.
- Provide a safe, healthy and hygienic working environment for all workers, and take appropriate measures to prevent and mitigate any occupational hazards, injuries or illnesses.
- Provide equal opportunities and non-discriminatory treatment for all workers, regardless of their race, colour, gender, age, religion, disability, sexual orientation, marital status, or any other protected characteristic.
- Prevent and prohibit any form of harassment, bullying, abuse, or violence in the workplace, and provide a mechanism for workers to raise grievances and complaints without fear of retaliation.

## Environment

MUFG Pension & Market Services is committed to reducing our environmental footprint and supporting the transition to a low-carbon economy. We encourage all suppliers to set science-based greenhouse gas emissions reduction targets.

Our suppliers must:

- Comply with all applicable environmental laws and regulations, and obtain and maintain all necessary permits and licenses for their operations.
- Seek to minimise their environmental impact and resource consumption, and adopt measures to reduce greenhouse gas emissions, waste generation, water use, and energy use.
- Prevent and minimise any pollution or environmental damage that may result from their activities, and implement appropriate emergency response plans and procedures.
- Seek to use environmentally friendly and sustainable materials, products and services wherever possible, and avoid the use of hazardous or harmful substances.
- Work towards a circular economy and the principles of reduce, reuse and recycle, and ensure the proper disposal or recycling of any waste or materials.
- Seek to protect and conserve biodiversity and natural habitats, and respect the rights and interests of Indigenous peoples and local communities.

## Anti-Corruption

We conduct our business with integrity, honesty and transparency, and do not tolerate any form of corruption.

Our suppliers must:

- Comply with all applicable anti-corruption laws and regulations, and adhere to the principles of the United Nations Convention against Corruption.
- Not engage in any form of corruption, bribery, extortion, fraud, embezzlement, money laundering, or tax evasion, either directly or indirectly, in relation to their dealings with us or any other party.
- Not offer, promise, give, request, accept, or receive any gifts, hospitality, entertainment, or anything of value that could influence or appear to influence the outcome of any business decision or transaction.
- Maintain accurate and complete records of all their transactions and activities, and provide us with any information or documentation that we may request to verify their compliance with this Code.

## Governance

MUFG Pension & Market Services operates in accordance with the highest standards of corporate governance and ethical conduct.

Our suppliers must:

- Establish and implement effective policies, procedures and systems to ensure their compliance with this Code and all applicable laws and regulations.
- Monitor their own performance and compliance with this Code, and report any issues or breaches to us promptly.
- Cooperate with us and any third party that we may appoint to monitor and verify their compliance with this Code, and provide us with access to their premises, records and personnel as required.
- Implement corrective actions and improvements to address any non-compliance or gaps identified by us or any third party, and provide us with evidence of their completion and effectiveness.

## Raising Concerns and Whistleblowing

We expect that suppliers will have a process in place for their employees and contractors to raise concerns or queries. Where a concern is raised, the expectation is that it will be investigated promptly, thoroughly and if necessary, anonymously.

Where permitted by law, and if relevant to our business relationship, suppliers must inform us of the concerns.

We also encourage suppliers and their employees, contractors or agents to contact us directly with any concerns in relation to this Code, whether in relation to the conduct of MUFG Pension & Market Services and its representatives, or conduct within their own organisation that has a direct impact on our business.

Suppliers can either:

- (1) contact their key MUFG Pension & Market Services point of contact; or
- (2) contact the Procurement team at [info@mpms.mufg.com](mailto:info@mpms.mufg.com)

Alternatively, a report may be made through FairCall, an external and independent provider, contracted by MUFG Pension & Market Services to receive disclosures impartially and confidentially.

You can contact FairCall by:

**Telephone:**

- 1800 500 965 (within Australia)
- 0800 100 526 (within New Zealand)
- 0808 234 7091 (within UK)
- 1800 200 625 (within Ireland)
- 0008 0004 022 32 (within India)
- +61 2 9335 8785 (all other countries)

**Online:** <http://www.kpmgfaircall.kpmg.com.au/MUFGPensionandMarket>

Suppliers can also refer to our Whistleblower Policy for further information:  
<https://www.mpms.mufg.com/docs/Whistleblower-Policy.pdf>

**Further information**

We welcome questions and feedback on our Supplier Code of Conduct.

Please contact us at [info@mpms.mufg.com](mailto:info@mpms.mufg.com)

You can also find out more about our commitment to sustainability at  
<https://mpms.mufg.com/sustainability.html>